

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND

U-NEST HOLDINGS, INC.,

Plaintiff,

V.

C.A. No. 1:19-CV-00659-WES-PAS

ASCENSUS COLLEGE SAVINGS  
RECORDKEEPING SERVICES, LLC,

Defendant.

**DEFENDANT’S OBJECTION TO PLAINTIFF’S  
EMERGENCY MOTION FOR PRELIMINARY INJUNCTION**

Defendant Ascensus College Savings Recordkeeping Services, LLC (“Ascensus”) hereby objects to Plaintiff U-Nest Holdings, Inc.’s (“U-Nest”) Emergency Motion for Preliminary Injunction alleging breach of a November 27, 2019 Settlement Agreement.

The grounds for this objection are set forth in the accompanying memorandum of law, declaration, and exhibits.

Defendant ASCENSUS COLLEGE SAVINGS  
RECORDKEEPING SERVICES, LLC

By its Attorneys,

/s/ David A. Wollin

Gerald J. Petros (#2931)

Mitchell R. Edwards (#6942)

Hinckley Allen & Snyder LLP

100 Westminster Street, Suite 1500

Providence, RI 02903-2319

T: (401) 274-2000

F: (401) 277-9600

gpetros@hinckleyallen.com

medwards@hinckleyallen.com

Dated: December 31, 2019

**CERTIFICATE OF SERVICE**

I hereby certify that on December 31, 2019, a copy of the foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing.

Joseph A. Farside, Jr., Esq.  
Krystle G. Tadesse, Esq.  
Samantha M. Vasques, Esq.  
Locke Lord LLP  
2800 Financial Plaza  
Providence, RI 02903  
T: (401) 274-9200  
F: (401) 276-6611  
joseph.farside@lockelord.com  
krystle.tadesse@lockelord.com  
samantha.vasques@lockelord.com

/s/ David A. Wollin